

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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TELECOM BUSINESS SOLUTION, LLC, <i>et al.</i> ,	: Civil Action : 1:22-cv-01761
	:
Petitioners,	: Judge Lewis A. Kaplan
	:
v.	: Magistrate Judge Robert W.
	: Lehrburger
TERRA TOWERS CORP., <i>et al.</i> ,	:
	:
Respondents.	:
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**NOTICE OF MOTION FOR CIVIL AND/OR CRIMINAL CONTEMPT SANCTIONS  
AGAINST RESPONDENTS FOR CONTINUED NON-COMPLIANCE WITH  
INFORMATION SUBPOENAS AND SUBPOENAS *DUCES TECUM***

PLEASE TAKE NOTICE that, upon the accompanying (i) Memorandum of Law in Support of the Motion for Civil and/or Criminal Contempt Sanctions against Respondents for Continued Non-Compliance with Information Subpoenas and Subpoenas *Duces Tecum* (the “Memorandum”); and (ii) the Declaration of Katherine M. Poldneff in Support of the Motion for Civil and/or Criminal Contempt Sanctions against Respondents for Continued Non-Compliance with Information Subpoenas and Subpoenas *Duces Tecum*, and exhibits thereto, Petitioners Telecom Business Solution, LLC, LATAM Towers, LLC, and AMLQ Holdings (Cay), Ltd., by and through undersigned counsel, hereby move this Court for an Order granting the relief requested in the Memorandum and Proposed Order, and granting such other and further relief as the Court deems just and proper.

Dated: June 25, 2025

Respectfully submitted,

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(admitted *pro hac vice*)  
Katherine M. Poldneff  
Ashtyn N. Saltz

By: /s/ Gregg L. Weiner  
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*Counsel for Petitioner AMLQ Holdings  
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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was filed electronically on June 24, 2025. Notice of this filing will be sent to all counsel of record through the Court's electronic notice system.

/s/ Michael N. Ungar  
*Counsel for Telecom Business Solution, LLC  
and LATAM Towers, LLC*